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August 27, 2021

VIA ECF

United States District Court
Western District of New York
Attn: Hon. Elizabeth A. Wolford, Chief U.S.D.J.
100 State Street
Rochester, NY 14614-1309

Re: Garcia v. Lewis Tree Service, Inc., *et ano.*
Case No.: 1:21-cv-6393 (EAW)
Plaintiff's Letter Motion for Extension of Time of Briefing Schedule

Dear Chief Judge Wolford:

This office represents the Plaintiff in the above-referenced case. Plaintiff writes jointly with Defendants to respectfully request an enlargement of the briefing schedule for Defendants' motion to dismiss (see Docket Entries 11-14) as follows: (i) a forty-five (45) day extension of time to oppose Defendants' motion to dismiss; and (ii) a two (2) week period thereafter for Defendants to submit a reply in further support.

Plaintiff's opposition papers are currently due on August 31, 2021, with Defendants' reply papers due on September 7, 2021. The requested extension would make those dates October 15, 2021 and October 29, 2021, respectively. Defendants join in and thus consent to the instant application. The parties are not aware of any other scheduled dates that are affected by the requested extensions. This is also the parties' first request for an extension concerning opposition and reply papers. The reason for the requested extension of time is to permit the parties with additional time to brief the motion and due to the Jewish High Holidays, all falling out in September of this year. Accordingly, the parties submit that good cause exists to grant the requested extension. See Fed. R. Civ. P. 6(b)(1)(A) and 16(b)(4). Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Forest Hills, New York
August 27, 2021

Respectfully submitted,
SHALOM LAW, PLLC
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